DA 17-1180

PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON RESPONSE EFFORTS UNDERTAKEN DURING 2017 HURRICANE SEASON

PS Docket No. 17-344

Regarding Question D3

3. Was radio frequency information shared among service providers? Were there instances of interference and were they resolved in a timely and effective manner?

While I was not directly involved with the public safety response to Harvey and Irma, I did support some of the public safety efforts for the agencies that were on the ground. Two things were notable:

A. There is no single repository for State, Regional or Local government Tactical Interoperability Communication Plans (TICP), Field Operations Guides (FOG) or for an ICS-205 Communication Plan. On large ICS Type 2 and Type 1events with responders coming from many states, knowing what mutual aid / interoperability frequencies may be available ahead of time is critical. Even though the resource may not be operational, it at least gives those coming to assist through mutual aid agreements and EMAC deployments, knowledge of what frequency bands are being used. This helps responders to better prepare a communications plan and program radios prior to arrival.

NPSTC has created Interoperability Best Practices and *Best Practice #13 Interoperability Resources Information – Storage and Access* may be of benefit regarding this topic. The Interoperability Best Practices are available on the NPSTC website www.npstc.org. Many issues are discussed in the Best Practice including information security and other concerns about posting the information.

B. There were two different communication groups deployed to the hurricanes. FEMA USAR teams, consisting of local government responders, were deployed by FEMA. The USAR teams and their communication units are well organized and trained. The other group that responded was state and local government agencies deployed by Emergency Management Assistance Compact (EMAC) requests. While speaking with the EMAC group from Tennessee deployed to hurricane Harvey, I discovered the communications unit was not given a communications point of contact and they were setting up and deploying communications by monitoring nationwide

FCC designated interoperability channels for radio traffic. If no traffic was heard after a period of time, it was assumed no one was assigned the frequency / channel. I was able to give the EMAC communications unit POC information for the Harris County COML so they could coordinate their communications and mitigate interference.

While EMAC teams are given a POC for the location they are being deployed, no communications POC or information is being provided. When out of area teams are coming into an area for mutual aid, radio frequency information should be included in the EMAC documentation so the incoming teams can work with the Communication Unit Leader (COML) or ESF 2 manager. This will allow incoming teams time to develop a communications plan prior to their arrival and mitigate radio frequency interference. Incoming teams not only need the state EMAC coordinator information, but the local communications / COML POC within the state, county or city where they are being deployed.

C. I do commend the FCC for being proactive and having a 24/7 coordination center to contact. There was a concern about requesting a STA without having to make the request on-line at the FCC's website, hat can be difficult to use because of JAVA conflicts. It was good information to find out that we could make a phone call to the FCC and obtain a verbal STA valid for 10 days. Maybe the FCC could better educate the public safety community regarding their capabilities during times of disasters at events such as APCO, NENA, IWCE, etc. and articles in the trade magazines such as Mission Critical Mag, Public Safety Communications and others.

D. One question did arise several times, regarding the usage of the FCC Nationwide Interoperability Channels usage outside of your jurisdictional area of operation. Since the FCC By Rule allows for usage of the FCC designated nationwide interoperability for public safety holders of an FCC license, is it permissible to use those channels outside of your jurisdictional area? For example, a Tennessee team is in Texas on an EMAC deployment, are they permitted to use the VHF/UHF/700/800 MHz nationwide FCC designated interoperability channels as public safety FCC license holders for hand held or mobile simplex operation?

Thank you for making an inquiry about the issues during times of disasters and allowing us to comment.